

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE No.: 23-CV-61256-BECERRA/STRAUSS**

MONARCH AIR GROUP, LLC,  
a Florida Limited Liability Company,

Plaintiff,

v.

JOURNALISM DEVELOPMENT  
NETWORK, INC., A Maryland Corporation,  
and LILY DOBROVOLSKAYA,

Defendants.

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**NOTICE OF NINETY DAYS EXPIRING**

Pursuant to Local Rule 7.1(b)(4)(B), Defendant Journalism Development Network, Inc. (“JDN”) hereby respectfully notifies this Court that a dispositive motion to dismiss is pending, was fully briefed more than 90 days ago, and has not been set for hearing.

**Case Overview**

The Complaint in this matter asserts three claims by Plaintiff Monarch Air Group, LLC: a claim for defamation per se against JDN and co-Defendant Lily Dobrovolskaya (“Dobrovolskaya”) in Count I; a claim for defamation by implication against JDN and Dobrovolskaya in Count II; and a claim for defamation per se solely against Dobrovolskaya in Count III. [ECF No. 1-2 at pp. 7-82] On March 7, 2024, this case was reassigned from Judge Cannon to this Court. [ECF No. 54]

**Pending Motion**

As required by Local Rule 7.1(b)(4)(B)(i)-(iv), JDN provides notice of the following docket entries and dates:

<b>Name of Motion</b>	<b>Docket Entry</b>	<b>Filing/Service Date</b>
Lily Dobrovolskaya's Motion to Dismiss for Insufficient Service of Process, Lack of Jurisdiction, and Failure to State a Claim	ECF No. 45	Jan. 10, 2024
Response to Lily Dobrovolskaya's Motion to Dismiss	ECF No. 49	Feb. 14, 2024
Lily Dobrovolskaya's Reply in Support of Her Motion to Dismiss for Insufficient Service of Process, Lack of Jurisdiction, and Failure to State a Claim	ECF No. 53	Feb. 28, 2024
No Hearing Has Been Scheduled	N/A	N/A

Respectfully submitted,

THOMAS & LOCICERO PL

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this **25th** day of **June, 2024**, I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all parties and counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronic Notices of Electronic Filing.

/s/ Dana J. McElroy

Attorney